

ACLU-PA has approximately 16,000 members across the Commonwealth, including some whose children attend high schools in the Lower Merriion School District. The principal mission of the ACLU-PA is to protect the civil liberties of those who live, work and raise families in this Commonwealth. The ACLU-PA has a long history of defending Pennsylvanians' privacy rights in both the federal and state courts, as counsel for parties in some cases and as *amicus curiae* in others.

2. The ACLU-PA takes the unusual step of submitting a brief *amicus curiae* at this early stage of a U.S. District Court proceeding because of the egregious privacy violation alleged by the plaintiffs in this case, and because the briefs submitted to the Court thus far provide incomplete citation to relevant case precedent. The ACLU-PA relies on the factual allegations contained in plaintiffs' Class Action Complaint, particularly paragraphs 23-26. This brief is limited to supporting plaintiffs' argument that the school district's actions, assuming the validity of the allegations, violate the Fourth Amendment to the U.S. Constitution and, therefore, this Court should issue an appropriate preliminary injunction order enjoining the school

district from activating students' laptop cameras or any other electronic monitoring devices until further order of this Court.

WHEREFORE, for the foregoing reasons the ACLU-PA respectfully requests that this court grant this motion to allow the ACLU file the attached brief, *amicus curiae*.

Respectfully submitted,

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